

GORDON  
ARATA  
McCOLLAM  
DUPLANTIS  
&  
EAGAN LLP

ATTORNEYS AT LAW

B. J. Duplantis  
bduplantis@gamde.com

P.O. Box 81829 (Zip 70598-1829)  
625 East Kaliste Saloom Road, Suite 301  
Lafayette, Louisiana 70508-2540  
(337) 237-0132 • Fax (337) 237-3451  
www.gamde.com

July 12, 2004

Ref: 2017-20950

Honorable James H. Welsh  
Commissioner of Conservation  
Post Office Box 94275  
Baton Rouge, LA 70804-4275

Re: Hearing Application  
CM 227 Zone, Reservoir A, B and C  
Lake Washington Field  
Plaquemines Parish, Louisiana  
Applicant: Swift Energy Company

Dear Mr. Commissioner:

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, application is hereby made on behalf of **Swift Energy Company** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the CM 227 Zone, Reservoirs A, B, and C, in the Lake Washington Field, Plaquemines Parish, Louisiana

CM 227 Zone, Reservoir A

1. To dissolve the existing drilling and production unit created as the CM 227 Zone, Reservoir A, established by Office of Conservation Order No. 149-FFF and to simultaneously create a revised single drilling and production unit of approximately 3 acres for the CM 227 Zone, Reservoir A, designated as the CM 227 RA SUA in the Lake Washington Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat;
2. The CM 227 Zone, Reservoir A in the Lake Washington Field, Plaquemines Parish, Louisiana was previously defined in Office of Conservation Order No. 149-FFF, effective October 1, 2003, and is further defined in Reservoir A as being that oil and gas bearing zone encountered between the measured depths of 3,547 feet (-3215' subsea) and 4,190 feet (-3645' subsea) (electrical log measurements) in the Swift Energy No. 5 State Lease 17266 (Cockrell-Moran #247) Well, located in Section 6, Township 20 South, Range 27 East.
3. To grant an exception to the spacing provisions of Office of Conservation Order No. 149-FFF and Statewide Order No. 29-E and to permit applicant, Swift Energy Company to drill, designate and utilize an alternate unit well for the CM 227 Zone, Reservoir A, such well to be at the location shown on the plat attached hereto and made a part hereof;
4. To make a specific finding that such proposed alternate unit well is necessary to effectively and efficiently drain a portion of the CM 227 RA SUA which cannot be efficiently and economically drained by other wells within the unit;

GAMD-LAF:26041-1

201 St. Charles Avenue, 40th Floor • New Orleans, Louisiana 70170-4000 • (504) 582-1111 • Fax (504) 582-1121  
One American Place • 301 Main Street, Suite 1400 • Baton Rouge, Louisiana 70825 • (225) 381-9643 • Fax (225) 336-9763  
2200 West Loop South, Suite 1050 • Houston, Texas 77027 • (713) 333-5500 • Fax (713) 333-5501

5. To grant a single unit allowable for the CM 227 RA SUA and to permit the operator of the unit to produce said unit allowable from the unit well, the existing alternate unit well, the proposed alternate unit well, or from all wells in the unit, at its option;
6. To confirm Swift Energy Company as operator for the CM 227 RA SUA;
7. To find that, except to the extent contrary to the order granted by the Commissioner of Conservation in connection with the hearing held on this application, the provisions of Office of Conservation No. 149-FFF shall remain in full force and effect;
8. To consider such other matters pertinent to this application as shown by the evidence presented at the hearing held on this matter.

**CM 227 ZONE, RESERVOIR B**

1. To create a single drilling and production unit for the CM 227 Zone, Reservoir B, designated as the CM 227 RB SUA, containing approximately 6.8 acres, Lake Washington Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat;
2. The CM 227 Zone, Reservoir A, in Lake Washington Field, Plaquemines Parish, Louisiana was previously defined in Office of Conservation Order No. 149-FFF, effective October 1, 2003, and is further defined in Reservoir B as that oil and gas bearing zone encountered between the depths of 3,313 feet (-3213 subsea) and 3,850 feet (-3626' subsea) in the Swift Energy No. 7 State Lease 17266 (Cockrell-Moran #286) Well, located in Section 6, Township 20 South, Range 27 East, Plaquemines Parish, Louisiana.

**CM 227 ZONE, RESERVOIR C**

1. To create a single drilling and production unit for the CM 227 Zone, Reservoir C, designated as the CM 227 RC SUA, containing approximately 2.5 acres, Lake Washington Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat;
2. The CM 227 Zone, Reservoir A, in Lake Washington Field, Plaquemines Parish, Louisiana was previously defined in Office of Conservation Order No. 149-FFF, effective October 1, 2003, and is further defined in Reservoir C as that oil and gas bearing zone encountered between the depths of 3,964 feet (-3476 subsea) and 4,422 feet (-3865' subsea) (electrical log measurements) in the Swift Energy No. 6 State Lease 17266 (Cockrell-Moran #264st) Well, located in Section 6, Township 20 South, Range 27 East, Plaquemines Parish, Louisiana.

**For Reservoirs B and C**

1. To establish rules and regulations governing the exploration for and production of oil and gas from the said units;
2. To designate a unit operator and unit wells for the units created herein;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created, with each tract sharing in unit production on a surface acreage basis of participation;
4. To consider such other matters relating to the subject reservoir as may be appropriate and justified by the evidence presented at the public hearing.

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, the Commissioner of Conservation, the District Manager of the Lafayette District of the Office of Conservation and all interested owners, represented parties and interested parties known to the applicant after a reasonable search were notified in writing in the pre-application notice dated June 29, 2004 that a conference to discuss the proposed application was tentatively scheduled for 10:00 a.m. on Wednesday, July 21, 2004. It was stated at that time that this conference would be held only if a request to confer were received by the undersigned within ten (10) calendar days after the date of the pre-application notice. No requests to confer were received either in writing or by telephone and, in accordance with the Rules of Procedure, the tentatively scheduled conference **WILL NOT BE HELD.**

Attached hereto and made a part hereof is a plat outlining the CM 227 RA SUA, CM 227 RB SUA, and CM 227 RC SUA, Lake Washington Field, Plaquemines Parish, Louisiana, and a list of the names and addresses of the interested owners, represented parties and interested parties to whom this notice is being sent. It is hereby certified that a reasonable effort was made to ascertain the names and addresses of all interested owners, represented parties and interested parties.

Any pertinent data relating to the proposed unit can be obtained, AT THE COST OF THE REQUESTING PARTY, from Mr. Remy Williams of W. H. Robbins & Associates, Inc., 140 Rue Beauregard, Suite 100, Lafayette, La 70508 (337) 232-5004.

Finally, there is enclosed herewith our check on behalf of the applicant in the amount of \$755.00, made payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

  
B. J. Duplantier

BJD/ht

Attachments

cc: Mr. Richard D. Hudson  
District Manager, Office of Conservation

All Interested Owners, Represented Parties  
and Interested Parties

